

EXHIBIT I

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON,)

)

PLAINTIFF,)

vs.)

CASE NO. 3:17-CV-

)05806-RJB

THE GEO GROUP, INC.,)

)

DEFENDANTS.)

)

DEPOSITION OF JAMES CHARLES HILL,

30(b)(6) WITNESS FOR THE GEO GROUP, INC.

WEDNESDAY, JULY 10, 2019

REPORTER:

JESSICA N. NAVARRO,

C.S.R. NO. 13512

JOB NO: 3441242

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1 DEPOSITION OF JAMES CHARLES HILL, TAKEN ON BEHALF OF
2 PLAINTIFF AT 10:00 A.M., ON WEDNESDAY, JULY 10, 2019, AT
3 400 SOUTH HOPE STREET, 8TH FLOOR, LOS ANGELES,
4 CALIFORNIA, BEFORE JESSICA N. NAVARRO, C.S.R. NO. 13512,
5 PURSUANT TO NOTICE.

6
7 APPEARANCES OF COUNSEL

8
9 FOR PLAINTIFF:

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JAMES CHARLES HILLS	BY MS. BRENNEKE	5

E X H I B I T S

NO.	PAGE	DESCRIPTION
EX. 251	31	NOTICE OF CONTINUING DEPOSITION PURSUANT TO RULE 30(b)(6) AND DEMAND FOR DESIGNATION OF REPRESENTATIVES DEPONENT
EX. 252	68	CONSOLIDATED FINANCIAL STATEMENT FOR 2005 THROUGH 2018 FOR NORTHWEST DETENTION CENTER
EX. 253	80	CONSOLIDATED FINANCIAL STATEMENT FOR 2005 THROUGH 2018 FOR NORTHWEST DETENTION CENTER WITH HANDWRITTEN CALCULATIONS
EX. 254	138	2015 ICE FISCAL YEAR CONTRACT BILLING ACCUMULATION PER CLIN
EX. 255	169	NORTHWEST DETENTION CENTER TACOMA, WASHINGTON REVISED PRICING
EX. 256	175	LETTER FROM AMBER MARTIN, VICE PRESIDENT OF CONTRACTS FOR GEO, DATED NOVEMBER 19, 2009 TO BOBBY WRIGHT OF U.S. DEPARTMENT OF HOMELAND SECURITY
EX. 257	177	EMAIL CHAIN WITH ATTACHMENTS



1 EXHIBITS (CONTINUED) :

2 NO. PAGE DESCRIPTION

3 EX. 258 188 EMAIL FROM ERIC SMITH TO GEORGE

4 WIGEN WITH ATTACHMENTS

5 EX. 259 211 EMAIL CHAIN

6 EX. 260 233 EMAIL FROM RYAN KIMBLE TO CHUCK HILL

7

8

9

10 QUESTIONS INSTRUCTED NOT TO BE ANSWERED

11 (NONE)

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LOS ANGELES, CALIFORNIA

WEDNESDAY, JULY 10, 2019, 10:00 A.M.

-0-

JAMES CHARLES HILLS,

having been duly administered an oath by the
reporter, was examined and testified as follows:

EXAMINATION

BY MS. BRENNEKE:

Q Will you please state your name?

A James Charles Hill.

Q And what is your work address?

A 6100 Center Drive, Suite 825, Los Angeles,
California 90045.

Q Will you please state your employer and
your title?

A The GEO Group and I'm the Director of
Business Management of the Western Region.

Q You've been designated by the GEO Group as
the 30(b)(6) or corporate representative for this
deposition today; is that true?

A Yes.

Q So I'm Andrea Brenneke and this is La Rond
Baker and we're here representing the State of



1 outside the scope?

2 THE WITNESS: Where did we leave off?

3 BY MS. BRENNEKE:

4 Q You left off at -- you said operations
5 division, senior VP of operations. We don't have a
6 name?

7 A John Hurley, H-U-R-L-E-Y. VP of
8 Administration, Kyle Schiller, S-C-H-I-L-L-E-R. And
9 from the Finance Division, Chief Financial Officer,
10 Brian Evans, E-V-A-N-S. And I believe that would
11 conclude the list.

12 Q Okay. And you were involved in the 2015
13 bid process with the Northwest Detention Center as
14 to the pricing --

15 MS. ARMSTRONG: Object to the form.

16 BY MS. BRENNEKE:

17 Q -- component?

18 MS. ARMSTRONG: Outside the scope.

19 THE WITNESS: Yes, I reviewed the pricing
20 component.

21 BY MS. BRENNEKE:

22 Q Okay. Did you have any involvement in any
23 of the other bids for Northwest Detention Center
24 services in prior contracts?

25 MS. ARMSTRONG: Objection; outside the



1 goes back from 2005 to the present. Are you aware
2 of that?

3 A Yes.

4 Q Okay. So I'm curious what you did to
5 prepare for this deposition, because obviously your
6 personal knowledge is a chunk of that. So, what did
7 you do to prepare?

8 A Specific to this deposition?

9 Q Yes.

10 A I spoke to different members of our
11 corporate office.

12 Q Okay.

13 A To get specific details that I might have
14 been lacking.

15 Q With whom did you speak?

16 A I spoke to Executive Vice President, Matt
17 Denadel, Chief Financial Officer, Brian Evans, and
18 Director of Finance, John Tyrrell.

19 Q Anyone else?

20 A Specific to this deposition, no.

21 Q Okay. Did you review any documents in
22 preparation for your deposition today?

23 A Yes.

24 Q And what documents did you review?

25 A Documents provided by counsel that had



1 for the years 2005 through 2018.

2 Q For what?

3 MS. ARMSTRONG: Object to the form.

4 THE WITNESS: Northwest Detention Center.

5 BY MS. BRENNEKE:

6 Q Okay. And if I'm understanding this
7 correctly, it's full years 2006 through 2018 and
8 three months of 2005; is that correct?

9 A Yes, these are annual amounts from 2006 to
10 2018 and three months for 2005.

11 Q Okay. There's no reporting for 2019
12 because it's in progress; is that correct?

13 A I believe that would be the reason.

14 Q Did you generate this report?

15 A I did not.

16 Q Do you know who did?

17 A I'd have to speculate from who the
18 corporate office generated this report.

19 Q So based upon your understanding of the
20 corporate structure and who's responsible for such
21 things, who -- what's your understanding of who
22 generated this report?

23 MS. ARMSTRONG: Object to the form.

24 THE WITNESS: This most likely would have
25 been generated by CFO Brian Evans and most likely be



1 John Tyrrell, Director of Finance.

2 BY MS. BRENNEKE:

3 Q Is this something that you asked John
4 Tyrrell to generate for you as part of the
5 preparation for your deposition today?

6 A I did not ask John Tyrrell for this.

7 Q Did you understand that he would be
8 generating this for you?

9 A No.

10 Q Have you seen this document before today?

11 A No.

12 Q Okay. So is this as much a surprise to
13 you as it is to me?

14 MS. ARMSTRONG: Object to the form.

15 THE WITNESS: I -- having reviewed this, I
16 would have expected it to be generated.

17 BY MS. BRENNEKE:

18 Q Okay. Great. So it's part of your --
19 part of your capacity to testify to the finances
20 over a long period of time; is that right?

21 MS. ARMSTRONG: Object to the form;
22 outside the scope.

23 THE WITNESS: Yes.

24 BY MS. BRENNEKE:

25 Q Okay. So, will you describe whether the



1 STATE OF CALIFORNIA)
2 COUNTY OF LOS ANGELES) ss.

3
4 I, JESSICA N. NAVARRO, C.S.R. NO. 13512, in
5 and for the State of California, do hereby certify:

6 That prior to being examined, the witness
7 named in the foregoing deposition was by me duly sworn
8 to testify to the truth, the whole truth, and nothing
9 but the truth;

10 That said deposition was taken down by me in
11 the shorthand at the time and place therein named and
12 thereafter reduced to typewriting under my direction,
13 and the same is a true, correct, and complete transcript
14 of said proceedings;

15 That if the foregoing pertains to the original
16 transcript of a deposition in a Federal Case, before
17 completion of the proceedings, review of the transcript
18 [] was [] was not required.

19 I further certify I am not interested in the
20 event of the action.

21 Witness my hand this 16th day of July, 2019.

22 

23
24 <%18541,Signature%>

25 JESSICA N. NAVARRO, C.S.R. NO. 13512

